

AECOM

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May 21, 2009

Mr. Ryan Benefield
Chief of Hazardous Waste Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Subject: **Response to Comments on the Wormald Site Investigation
Report (April 27, 2009)
Tyco Safety Products – Former Cedar Chemical Facility
Helena – West Helena, Arkansas
State EPA ID No. ARD990660649**

Dear Mr. Benefield:

This letter is in response to written comments on the *Revised Wormald Site Investigation Report* (AECOM, April 27, 2009) (Revised Wormald SIR) provided by the Arkansas Department of Environmental Quality (ADEQ) in correspondence to AECOM dated May 4, 2009.

1) **Comment:**

The 2nd paragraph (page 3) of the SIR mentions soil samples from the 1 to 4 foot interval and the 8 to 12 foot interval at TSB-1 were prepped and held pending analysis of the 4 to 8 foot sample. The SIR also states the 4 to 8 foot sample intervals were not analyzed since the concentrations of dinoseb at TSB-1 was less than the EPA Region VI MSL. The first paragraph (page 3) states all soil samples in the 4 to 8 foot interval exceeded the EPA Region VI MCL-based soil screening level for dinoseb. The first and second paragraph contradict one another and should be revised accordingly. The statement that “no further delineation is required” is not necessarily correct and should be revised.

Response:

The text from the 2nd paragraph of page 3 will be clarified to say:
“Soil samples from the 1 to 4 foot and 8 to 12 foot interval at TSB-1 were prepped and held pending the analysis of the 4 to 8 foot sample. Sample results were initially screened against the EPA Region 6 MSL for dinoseb in industrial soil, which had been used previously as a SSL at the Site. Therefore, soil samples from the 1 to 4 foot and 8 to 12 foot interval were not initially analyzed since the concentration of dinoseb at TSB-1 (4 to 8 foot) was less than the EPA Region 6 MSL for industrial soil. Subsequent comments from the ADEQ dated April 9, 2009 (Appendix A) indicated that the soil sample results should also be compared to the EPA Region 6 MCL-

based SSL. The soil samples were screened against the Region 6 MCL-based SSL for dinoseb. The SIR report text and tables were subsequently revised in late April (submittal date April 27, 2009). On April 15, 2009, the soil samples from the 1-4 foot and 8-12 foot intervals had exceeded their recommended holding times and could not be analyzed."

Regarding the last sentence of Comment 1 – comment noted. The statement that "no further delineation is required" has been removed from the report text.

2) **Comment:** *The actual surveyed location of the sample collected for this investigation is not included in the SIR (e.g., grid inclusive of horizontal datum survey coordinates). Please provide an actual gridded survey map showing the surveyed location of each sampling location. Note this map must be signed and stamped by a professional land surveyor.*

Response: A signed and stamped gridded survey map showing the surveyed location of each sampling location will be added to the document as Appendix E.

3) **Comment:** *Please note that soil samples collected at depths greater than 6" should be compared to MCL-based soil screening levels. At the point groundwater is encountered the MCL or tap water screening level.*

Response: AECOM did compare soil samples to the EPA Region 6 MCL-based SSL. Please refer to Table 1 of the *Revised Wormald SIR* (April 27, 2009).

The *Revised Wormald SIR* text is provided as change-out pages in Attachment A to this letter. Based on information received from the surveyor on May 21, 2009, there is a translation error in the basemap provided in Figure 2 which is currently being rectified. The revised Figure 2 and Appendix E will be provided by Wednesday, May 27, 2009 in separate submittal. If you have any questions or require additional information, please contact me at 864-234-2282 or Ms. Ann Faitz at (501)831-5637.

Sincerely,

AECOM



Leslee J. Alexander, P.G.
Project Manager

Response to Comments

May 21, 2009

Page 3

c: Mr. Dara Hall, ADEQ Counsel (letter only)
 Mr. John Perkins, Tyco Safety Products
 Ms. Ann Faitz, Tyco Counsel
 Mr. Allan Gates, HCC legal counsel
 Mr. Joe Ghormley, Exxon legal counsel
 Project File 104366

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ATTACHMENT 1
REVISED WORMALD SITE INVESTIGATION REPORT - CHANGEOUT PAGES

Change-out pages for the Revised Wormald Site Investigation Report

Errata pages are included to replace those provided in the April 27, 2009 *Revised Wormald Site Investigation Report*. Please replace the pages in your copy of the *Revised Wormald Site Investigation Report* with the pages provided in this submittal as described in the table below.

Section	Original Page Number(s)	Replacement/New Page Number(s)	Description of Change
Text	1 - 4	1 - 4	Report text was revised as described in the AECOM Response to ADEQ Comments (dated May 21, 2009)
Appendix A	NA	NA	A copy of the ADEQ Comment Letter (dated May 4, 2009) and the AECOM response to comments (dated May 21, 2009) are provided. Please append to the end of Appendix A.

NOTES:

ADEQ – Arkansas Department of Environmental Quality

NA – Not Applicable

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May 21, 2009

Mr. Ryan Benefield
Chief of Hazardous Waste Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Subject: **Revised Wormald Site Investigation Report**
Tyco Safety Products – Former Cedar Chemical Facility
Helena – West Helena, Arkansas
State EPA ID No. ARD990660649

Dear Mr. Benefield:

On behalf of Tyco Safety Products – Wormald U.S., Inc., AECOM is pleased to submit two copies of this *Revised Wormald Site Investigation Report* (Revised SIR) that summarizes the subsurface soil sampling activities and analytical results for soil samples collected from Site 3 - Stormwater Ditches at the Former Cedar Chemicals Facility located in Helena – West Helena, Arkansas (Figure 1). The Wormald Site Investigation was conducted in accordance with the *Wormald Site Investigation Work Plan* dated January 22, 2009, the subsequent Arkansas Department of Environmental Quality approval letter dated January 29, 2009, and the *Wormald Separate Agreement Pursuant to Consent Administrative Order LIS No. 07-027 for the Conduct of a Site Investigation and Feasibility Study* (Wormald Separate Agreement) between the Arkansas Department of Environmental Quality (ADEQ), and Ansul Incorporated, Wormald U.S., Inc dated January 9, 2009. This Revised SIR is submitted pursuant to comments provided by ADEQ to AECOM by letters dated April 9, 2009 and May 4, 2009 and received by AECOM on April 13, 2009 and May 11, 2009, respectively; and AECOM's letter responses to the comments dated April 27, 2009 and May 21, 2009. The comment and response letters are attached and incorporated in Appendix A of this Revised SIR. A summary of field activities, soil sampling procedures, and analytical results is provided below.

Investigation Objectives

During the 1996 Facility Investigation, dinoseb was reported at a concentration of 13,000 milligrams per kilogram (mg/kg) in subsurface soil sample 3SB-6 (4 to 8 feet below ground surface (bgs)) and identified as a contaminant of concern (COC) for Site 3 in the Risk Assessment (EnSafe, 1996; ADEQ, 2005). The Wormald Site Investigation focused on the collection of additional subsurface soil samples at Site 3 to confirm the concentration of dinoseb in subsurface soil at historic sample location 3SB-6 and to evaluate possible dinoseb concentrations in the vicinity of 3SB-6.

Site Reconnaissance

Prior to soil boring installation, historic soil sample 3SB-6 was located and staked by Smith and Weiland Surveyors, an Arkansas licensed land surveyor, as the location for TSB-1 using survey coordinates extracted from the basemap along with Figure 3 of the *Wormald Site Investigation Work Plan* (AECOM, January 2009). A 10 foot by 10 foot grid centered on TSB-1 was established by the surveyor and the locations for TSB-2 through TSB-5 were staked on this grid as proposed on Figure 3 of the *Wormald Investigation Work*

Plan. Utility clearance for all environmental sample locations was provided by Arkansas One-Call prior to intrusive work. Site surveying and utility clearance activities were conducted on March 4, 2009 and were overseen by the AECOM Project Geologist/Field Manager as documented in the Daily Quality Control Report included in Appendix B. A signed and stamped survey map is provided as Appendix E.

Borehole Installation, Lithologic Sampling and Headspace Screening

On March 5, 2009, five soil borings (TSB-1 through TSB-5) were installed within Site 3 for the collection of soil samples for dinoseb analysis (Figure 2). The additional analytical data were needed to confirm the reported concentration of dinoseb (13,000 mg/kg) at historical sample location 3SB-6 (EnSafe, 1996) and to assess the occurrence of dinoseb concentrations in the subsurface.

Soil borings were installed by Tri-State Testing Services, Inc., located in Memphis, Tennessee, using a Direct Push Technology (DPT) Geoprobe[®] rig. Continuous soil samples were collected from each soil boring and were logged for lithology by an AECOM Geologist. Lithologic classification was conducted in accordance with the Unified Soil Classification System (USCS) and soil descriptions were recorded on Test Boring Reports (Appendix B). A Photo Ionization Detector (PID) Organic Vapor Analyzer (OVA) was used to assess the qualitative concentration of potential volatile organic vapors present in vadose zone soil core samples. PID headspace results were recorded on Test Boring Reports (Appendix B).

Soil Sampling Program

Five soil borings, designated TSB-1 through TSB-5 (Figure 2), were installed at Site 3 to confirm and/or assess the occurrence of dinoseb concentrations in subsurface soil at historic soil sample location 3SB-6, collected from 4-8 feet bgs in lithologic boring LB-6 during the 1996 *Facility Investigation* (EnSafe). One primary soil sample was collected from 4-8 feet bgs at each boring for analysis of dinoseb. Two additional soil samples, one from 1-4 feet bgs and one from 8-12 feet bgs, were collected from TSB-1 and held for analysis pending dinoseb results from the 4-8 foot interval.

Soil was collected from the desired sample interval at each boring using DPT Geoprobe[®] rig with disposable acetate sample sleeves lining the core barrel. Soil samples were collected from the acetate sleeve using a decontaminated stainless steel spoon, were placed new, disposable zip-lock bags, and were thoroughly homogenized in the bags prior to containerization. A portion of the sample was later screened for organic vapors utilizing a PID OVA. Soil samples for laboratory analysis were containerized in laboratory supplied bottleware and placed in an ice filled cooler pending delivery to the laboratory.

Soil samples were analyzed for dinoseb by Environmental Testing and Consulting, Inc., located in Memphis, Tennessee, using Environmental Protection Agency (EPA) SW846 Method 8151A. Environmental Testing and Consulting, Inc. has been certified under the ADEQ Laboratory Certification Program and a copy of the certification is provided in Appendix C.

QA/QC Program

The quality assurance/quality control (QA/QC) program was implemented to provide a system of documented checks that ensures the authenticity and validity of the environmental data. QA/QC samples, including one field duplicate (soil) sample, one equipment rinsate blank sample, and one matrix spike/matrix spike duplicate (MS/MSD) sample, were collected and analyzed for dinoseb by EPA SW-846 Method 8151A. Results from the QA/QC samples were used during the data validation process as discussed in Data Validation Report (DVR) in Appendix D.

Analytical Test Results

Table 1 summarizes the results for dinoseb in subsurface soil samples collected from the 4 to 8 foot depth interval at Site 3. Dinoseb was reported in all samples at concentrations ranging from 31.3 milligrams per kilogram (mg/kg) in TSB-2 to 80.4 mg/kg at TSB-3. All results were significantly below the EPA Region 6 Medium-Specific Screening Level (MSL; 620 mg/kg) for dinoseb in industrial soil; however, the soil samples exceeded the EPA Region 6 Maximum Contaminant Level (MCL)-based soil screening level (SSL; $5.10\text{E-}02$ mg/kg) for dinoseb (US EPA Region 6, September 2008).

Soil samples from the 1 to 4 foot and 8 to 12 foot interval at TSB-1 were prepped and held pending the analysis of the 4 to 8 foot sample. Sample results were initially screened against the EPA Region 6 MSL for dinoseb in industrial soil, which had been used previously as a SSL at the Site. Therefore, soil samples from the 1 to 4 foot and 8 to 12 foot interval were not initially analyzed since the concentration of dinoseb at TSB-1 (4 to 8 foot) was less than the EPA Region 6 MSL for industrial soil. Subsequent comments from the ADEQ dated April 9, 2009 (Appendix A) indicated that the soil sample results should also be compared to the EPA Region 6 MCL-based SSL. The soil samples were screened against the Region 6 MCL-based SSL for dinoseb. The SIR report text and tables were subsequently revised in late April (submittal date April 27, 2009). On April 15, 2009, the soil samples from the 1-4 foot and 8-12 foot intervals had exceeded their recommended holding times and could not be analyzed.

The relative percent difference between the primary sample (TSB-1) and the field duplicate sample (TSB-1-a) was calculated and was less than the threshold established in the Data Quality Objectives of the *Wormald Site Investigation Work Plan* (AECOM, January 22, 2009). Results of the data validation indicate the data associated with this laboratory batch should be considered compliant and adequate for its intended use. The Data Validation Report is provided in Appendix D along with the Chain of Custody forms and analytical laboratory Certificate of Analysis.

Solid IDW Characterization and Management

All sampling equipment was pre-cleaned and wrapped in plastic prior to mobilization; therefore, on-Site equipment decontamination was not necessary. Used PPE, disposable sampling equipment, and other miscellaneous trash was consolidated in trash bags at the end of each day and sealed for subsequent off-Site disposal.

Soil generated during soil sampling activities was contained in a new 55-gallon drum approved by the Department of Transportation (DOT) and staged at a central location in accordance with all Federal, State and local requirements. The drum was labeled to indicate the type of material contained, place of origin, Site number and location, boring numbers, and date on which materials were initially placed in the container. An Investigation Derived Waste (IDW) Management Form was completed to document IDW generated during field activities and is include in Appendix B.

At the completion of field activities, a representative sample of solid IDW was collected for analysis of toxicity characteristic leaching procedure (TCLP) volatile organic compounds (VOCs) by EPA SW-846 Method 8260B, TCLP semi-volatile organic compounds (SVOCs) by EPA SW-846 Method 8270C, TCLP pesticides by EPA SW-846 Method 8081A, TCLP herbicides by EPA SW-846 8151A, and TCLP metals by EPA SW-846 Methods 6010B/7470A to evaluate disposal options. The TCLP results are presented in Table 2 and Certificates of Analysis are presented in Appendix D. The IDW soil sample results were below the Hazardous Waste Characterization Thresholds for all constituents analyzed. The drum of IDW soil is

currently staged on Site pending the selection and scheduling of an IDW disposal contractor. Once the disposal contractor has been procured, the drum of soil will be disposed of in accordance with Federal, State, and local requirements.

Conclusions

Although dinoseb was detected at concentrations above the EPA Region 6 MCL-based SSL in soil samples from borings TSB-1 through TSB-5, all reported concentrations were below the EPA Region 6 MSL for industrial soil. Confirmation sampling at TSB-1, which is co-located with historic soil sample 3SB-6, indicates that the dinoseb concentration of 13,000 mg/kg reported for 3SB-6 (4 – 8 feet) in the FI (EnSafe, 1996), is not representative of current Site 3 soil conditions.

Upon approval of this Revised SIR, Tyco Safety Products – Wormald U.S., Inc. will prepare a Feasibility Study pursuant to the Separate Agreement for submittal to the ADEQ on or before June 30, 2009. If you have any questions or require additional information, please contact me at 864-234-2282 or Ms. Ann Faitz at (501)831-5637.

Sincerely,

AECOM



Leslee J. Alexander, P.G.
Project Manager

Attachments: Figure 1 – Site Location Map
Figure 2 – Results for Dinoseb in Subsurface Soil at Site 3
Table 1 – Summary of Dinoseb Results in Soil Samples
Table 2 – Summary of TCLP Results in IDW Soil Sample
Appendix A – Comments and Response to Comments on the *Wormald Site Investigation Report*
Appendix B – Field Investigation Forms
Appendix C – Analytical Laboratory Certification
Appendix D - Data Validation Report/Certificates of Analysis
Appendix E – Surveyor Map

c: Mr. Dara Hall, ADEQ Counsel (letter only)
Mr. John Perkins, Tyco Safety Products
Ms. Ann Faitz, Tyco Counsel
Mr. Allan Gates, HCC legal counsel
Mr. Joe Ghormley, Exxon legal counsel
Project File 104366



ARKANSAS
Department of Environmental Quality

May 4, 2009

AECOM

Attn: Leslee J. Alexander, P.G.

Project Manager

10 Patwood Drive, Building VI, Suite 500

Greenville, South Carolina 29615

RE: Wormald Site Investigation Report for Cedar Chemical Company (April 27, 2009)
EPA ID Number ARD990660649; AFIN 54-00068

Dear Ms. Alexander:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) has reviewed the Response to Comments and Revised Wormald Site Investigation Report (SIR) dated April 27, 2009. Based on ADEQ review, the following deficiencies and/or concerns have been noted:

- The 2nd paragraph (page 3) of the SIR mentions the soil samples from the 1 to 4 foot interval and the 8 to 12 foot interval at TSB-1 were prepped and held pending analysis of the 4 to 8 foot sample. The SIR also states the 4 to 8 foot sample intervals were not analyzed since the concentrations of dinoseb at TSB-1 was less than the EPA Region VI MSL. The 1st paragraph (page 3) states all soil samples in the 4 to 8 foot interval exceeded the EPA Region VI MCL-based soil screening level for dinoseb. The 1st and 2nd paragraph contradict one another and should be revised accordingly. The statement that “no further delineation is required” is not necessarily correct and should be revised.
- The actual surveyed location of the sample collected for this investigation is not included in SIR (e.g., grid inclusive of horizontal datum survey coordinates). Please provide an actual grided survey map showing the surveyed location of each sampling location. Note this map must be signed and stamped by a professional land surveyor.
- Please note that soil samples collected at depths greater than 6” should be compared to MCL-based soil screening levels. At the point groundwater is encountered the MCL or tap water screening level.

Please prepare a response to each of the items noted above and submit a revised SIR to ADEQ within ten (10) days of receipt of this letter. If you have any questions or need additional information, please feel free to contact Tammie J. Hynum of my staff at (501) 682-0856 or hynum@adeq.state.ar.us or myself at (501) 682-0831 or at benefield@adeq.state.ar.us.

Sincerely,



J. Ryan Benefield, P.E.
Acting Chief
Hazardous Waste Division

cc: Mark Hemingway, P.G., (Amec Consultants, Inc.; 5725 Hwy 290 West, Suite 200B, Austin, TX 78735)
Kelly Beck, P.G., (Amec Consultants, Inc.; 5725 Hwy 290 West, Suite 200B, Austin, TX 78735)
Dave Roberson (DeMaximis, Inc. 2203 Timberloch Place, Suite 213 The Woodlands, TX 77380)
Anne Weinstein, Attorney Specialist, ADEQ
Dara Hall, Attorney Specialist, ADEQ
Allan Gates (Mitchell Williams Selig Gates & Woodyard, PLLC, 425 West Capitol Avenue, Suite 1800, Little Rock, AR 72201-3525)
Joe Ghormley (Quattlebaum, Grooms, Tull & Burrow, PLLC, 111 Center Street, Suite 1900, Little Rock, AR 72201)
Deborah D. Kuchler (Abbott, Simeses & Kulcher, 400 Lafayette St. Suite 200, New Orleans, LA 70130)
Edward Brister (Helena Chemical Co., 225 Schilling Blvd. , Suite 300, Collierville, TN 38017)
Dan Burnham (3225 Gallows Road, Suite 8B 0607, Fairfax, VA 22037)
Ann Faitz (Attorney at Law, 585 Silverwood, North Little Rock, AR 72116)
David Hawkins (General Counsel & Assistant Secretary, 225 Schilling Blvd., Suite 300, Collierville, TN 38017)
Kim Burke (Taft, Stettinius & Hollister LLP, 425 Walnut Street, Suite 1800, Cincinnati, OH 45202-3957)
Mark Zuschek (3225 Gallows Road, Suite 3D 2110, Fairfax, VA 22039)

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Response:

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Regarding the last sentence of Comment 1 – comment noted. The statement that "no further delineation is required" has been removed from the report text.

2) **Comment:** *The actual surveyed location of the sample collected for this investigation is not included in the SIR (e.g., grid inclusive of horizontal datum survey coordinates). Please provide an actual gridded survey map showing the surveyed location of each sampling location. Note this map must be signed and stamped by a professional land surveyor.*

Response: A signed and stamped gridded survey map showing the surveyed location of each sampling location will be added to the document as Appendix E.

3) **Comment:** *Please note that soil samples collected at depths greater than 6" should be compared to MCL-based soil screening levels. At the point groundwater is encountered the MCL or tap water screening level.*

Response: AECOM did compare soil samples to the EPA Region 6 MCL-based SSL. Please refer to Table 1 of the *Revised Wormald SIR* (April 27, 2009).

The *Revised Wormald SIR* text is provided as change-out pages in Attachment A to this letter. Based on information received from the surveyor on May 21, 2009, there is a translation error in the basemap provided in Figure 2 which is currently being rectified. The revised Figure 2 and Appendix E will be provided by Wednesday, May 27, 2009 in separate submittal. If you have any questions or require additional information, please contact me at 864-234-2282 or Ms. Ann Faitz at (501)831-5637.

Sincerely,

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Project Manager

Response to Comments

May 21, 2009

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